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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Tiffany D. Jackson  
William J. Jackson, Jr.

)  
)

Case No: 10-37721  
Chapter 13

**OBJECTION TO CONFIRMATION**

**COMES NOW**, Carl M. Bates, Chapter 13 Trustee, and moves this Court to deny confirmation of the Chapter 13 Plan filed on December 6, 2010, for the cause as follows:

1. The Debtors filed this Chapter 13 Petition on November 8, 2010 under 11 U.S.C. Chapter 13, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division.
2. This Objection is filed pursuant to 11 U.S.C. Section 1325 (b) (4) (A), and the Federal Rules of Bankruptcy Procedure 3015, and Local Bankruptcy Rules 3015-D.
3. Based upon information and belief, the debtor's income, for purposes of determining the applicable commitment period, exceeds the applicable median income and the proposed plan is only 36 months. Your trustee would suggest that the debtors' plan needs to be for a period of 60 months or propose to pay 100% of the allowed unsecured claims. In addition, Form 22c needs to be properly completed to determine whether or not all of the debtors' disposable income is being committed to the plan.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtors' proposed Chapter 13 Plan as filed with the Court, and for such further and other relief as in the premises may seem just.

Date: January 3, 2011

/s/Carl M. Bates  
Carl M. Bates  
Chapter 13 Trustee

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218-1819  
(804) 237-6800  
VSBN 27815

I hereby certify that on January 3, 2011, I have mailed or hand-delivered a true copy of the foregoing Objection to Confirmation to the debtor(s), Tiffany D. Jackson and William J. Jackson, Jr., 23329 Dabney Mill Road, Petersburg, VA 23803 and electronically sent to debtor's attorney, Christopher Mark Winslow, Esquire, chris@chriswinslow.com.

/s/Carl M. Bates  
Carl M. Bates  
Chapter 13 Trustee

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218-1819  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Tiffany D. Jackson ) Case No: 10-37721  
William J. Jackson, Jr. ) Chapter 13

Debtor Address 23329 Dabney Mill Road  
Petersburg, VA 23803

Last four digits of Social Security No(s).: 8377  
2332

**NOTICE OF OBJECTION TO CONFIRMATION**

Carl M. Bates, Chapter 13 Trustee, has filed papers with the Court objecting to confirmation of your Chapter 13 Plan, which was filed in this case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before seven (7) days before the date of the hearing, you or your attorney must:

**X File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.**

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

You must also mail a copy to:

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218-1819  
(804) 237-6800  
VSBN 27815

\_\_\_\_ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

X Attend the Hearing scheduled to be held on **January 12, 2011, at 9:00 A.M., at the U.S. Bankruptcy Court, U.S. Courthouse Annex, 701 East Broad Street, Room 5000, Richmond, VA, 23219.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an order granting that relief.

Date: January 3, 2011

/s/Carl M. Bates  
Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
(804) 237-6800  
VSBN 27815

**Certificate of Service**

I hereby certify that on January 3, 2011, I have mailed or hand-delivered a true copy of the foregoing Notice of Objection to Confirmation to the debtor(s), Tiffany D. Jackson and William J. Jackson, Jr., 23329 Dabney Mill Road, Petersburg, VA 23803 and electronically sent to debtor's attorney, Christopher Mark Winslow, Esquire, [chris@chriswinslow.com](mailto:chris@chriswinslow.com).

/s/Carl M. Bates  
Carl M. Bates  
Chapter 13 Trustee

Carl M. Bates  
Chapter 13 Trustee  
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